

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS (WORCESTER)

IN RE:

Ronda M Spurr,
Debtor

Case No. 19-40215-EDK
Chapter 13

MOTION TO APPROVE STIPULATION

Now comes LoanCare, LLC and states that a stipulation was entered into with the Debtor, subject to this Court's approval. A copy of said stipulation has been filed contemporaneously herewith. LoanCare, LLC respectfully requests that this Court approve said stipulation which contains the following default language:

IF THE DEBTOR FAILS TO MAKE SAID PAYMENTS BY THE DATES SPECIFIED IN PARAGRAPH TWO OF THIS STIPULATION, RELIEF FROM STAY MAY BE GRANTED WITHOUT HEARING BY THE COURT UPON CREDITOR FILING A CERTIFICATE OF NON-COMPLIANCE AFTER TEN (10) DAYS NOTICE OF DEFAULT TO THE DEBTOR AND THE DEBTOR'S ATTORNEY, BY FIRST CLASS MAIL POSTAGE PREPAID OR FACSIMILE. A \$50.00 FEE SHALL BE CHARGED FOR EACH NOTICE OF DEFAULT, AND A \$150.00 FEE SHALL BE CHARGED FOR EACH CERTIFICATE OF NON-COMPLIANCE NEEDED THROUGHOUT THE LIFE OF THIS STIPULATION AGREEMENT. THE DEBTOR HAS THE RIGHT TO OBJECT TO THE CERTIFICATE OF NON-COMPLIANCE ONLY ON THE BASIS THAT THE PAYMENTS WERE MADE TIMELY UNDER THE STIPULATION.

Respectfully submitted,
LoanCare, LLC,
By its Attorney

/s/ Zoh Nizami
Zoh Nizami, Esq.
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Dated: November 18, 2020

NOTICE

All objections to this Motion must be filed within fifteen (15) days of this date unless otherwise ordered by Court.



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CERTIFICATE OF SERVICE

I, Zoh Nizami, Esq., state that on November 18, 2020 I electronically filed the foregoing document with the United States Bankruptcy Court for the District of Massachusetts on behalf of **LoanCare, LLC** using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Kenneth E. Lindauer
Marcus Pratt
Denise M. Pappalardo
Richard T. King

I certify that I have mailed by first class mail, postage prepaid, the documents electronically filed with the Court on the following non CM/ECF participants:

Ronda M Spurr
34 John Street
Haverhill, MA 01830

City of Haverhill
4 Summer Street # 114
Haverhill, MA 01830

Portfolio Recovery Associates, LLC c/o Stepehen A. Wiener
Law Offices of Howard Lee Schiff PC
340 Main Street, Suite 959
Worcester, MA 01608

Respectfully submitted,
LoanCare, LLC,
By its Attorney

/s/ Zoh Nizami
Zoh Nizami, Esq.
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